
From: Castro, Cassandra </O=CVSCAREMARK/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=CCASTRO>
To: Schiavo, Craig
CC: Travassos, Michelle L.
Sent: 7/18/2013 3:10:03 PM
Subject: FW: Update to CSM LP Reviews for Accountability Meeting - July
Attachments: Store 675 LP Review (completed 7.10.13) Highlighted.xlsx; Store 3174 LP Review (completed 6.20.13) Highlighted.xlsx; Store 3512 LP Review (completed 6.27.13) Highlighted.xlsx; Store 4606 LP Review (completed 7.12.13) Highlighted.xlsx; Store 5099 LP Review (completed 7.15.13) Highlighted.xlsx; Store 7105 LP Review (completed 6.25.13) Highlighted.xlsx

Store 4606 - CS-3418414

From: Castro, Cassandra
Sent: Thursday, July 18, 2013 2:56 PM
To: Schiavo, Craig
Cc: Travassos, Michelle L.
Subject: Update to CSM LP Reviews for Accountability Meeting - July

Hi Craig,

Please see below for the records that have been summarized since the last meeting. Store 2229 will not have an attachment because of old format and not being able to highlight.

Store 3174 – [CS-3418233](#)
Store 2229 – [CS-3418326](#)
Store 0675 – [CS-3418372](#)
Store 3512 – CS-3418271
Store 5099 – CS-3418294
Store 7105 – CS-3418383

Store 4606 - CS-3418414 (will be finished shortly)

Thanks,
Cassandra

Cassandra Castro, CPhT | CVS Caremark | Lead Coordinator, Regulatory Compliance | P: 401-770-7836 | 1 CVS Drive, Woonsocket, RI 02895 | Cassandra.Castro2@CVSCaremark.com

CONFIDENTIALITY NOTICE: This communication and any attachments may contain confidential and/or privileged information for the use of the designated recipients named above. If you are not the intended recipient, you are hereby notified that you have received this communication in error and that any review, disclosure, dissemination, distribution or copying of it or its contents is prohibited. If you have received this communication in error, please notify the sender immediately by telephone and destroy all copies of this communication and any attachments.

Confidential

PLAINTIFFS TRIAL
EXHIBIT

P-08406_00001

CVS-MDLT3-000029184

P-08406 _ 00001

NON-RESPONSIVE DOCUMENT

CVS-MDLT3-000029185

NON-RESPONSIVE DOCUMENT

CVS-MDLT3-000029186

NON-RESPONSIVE DOCUMENT

CVS-MDLT3-000029187

NON-RESPONSIVE DOCUMENT

CVS-MDLT3-000029188

NON-RESPONSIVE DOCUMENT

CVS-MDLT3-000029189

DOCUMENT PRODUCED IN NATIVE FORMAT

LP STORE REVIEW

Store Number:	4606	PIC	Seth Terlecky
City/State:	Warren, Ohio	RPH 1	Lindsay Stober
RLPM	Rick Dancisin	RPH 2	
Witness	Lisa Ciccollela	Date:	7/12/2013

Read Legal disclaimer: The Company has been reviewing controlled substances dispensing for specific stores. Your store has had a significant number of prescriptions filled with respect to key identified characteristics. This review is being conducted at the request of counsel. Please keep this conversation confidential. The information you are being asked to provide will be reviewed by the compliance and legal departments. **Check box that legal disclaimer was read.** ☐

Pharmacy CII Hard Copy Script Overview		
	Review most recent C2 scripts (40-50)	RLPM Observations
1	VOLUME	What are the majority of CII prescriptions that were filled? Do they represent any drug categories? (i.e., opioids for pain management, opioids in general, and amphetamines)
2	VOLUME	Do the majority of CII opioid prescriptions that were filled appear to have been written for a particular drug name(s)? Below is a list of CII opioids:
OPIOIDS: hydromorphone (Dilaudid); methadone; oxycodone (single entity: oxycodone, Oxycontin, Roxicodone); oxycodone (combinations: Endocet, Percocet, Percodan, Roxicet, Tylox); Other opioids: morphine sulfate (MS Contin, Oramorph); oxymorphone (Opana); Fentanyl (Actiq, Duragesic)		
4	DOSE	What are some common opioid dosage units?
5	TRAVEL	Are there any out of area, 30 miles +, patients or prescribers? Describe
6	VOLUME	Who are the most common CII prescribers? Note any common prescribers with same or similar drug dispensing
7	PATIENT	Are there multiple patients with same prescriber dropping off script at the same time? Are they similar prescriptions?
8	COCKTAILS	Were there any CII opioid prescriptions written in combination with a benzodiazepine/muscle relaxant for the treatment of pain management?
9	COCKTAILS	Are there patients receiving any other specific drug combinations (cocktails)?
Benzodiazepines/muscle relaxant: Alprazolam (Xanax); clonazepam (Klonopin); diazepam (Valium); carisoprodol (Soma)		

Pharmacy Background		
Interview Question	PIC	RPH 1
What type of area is the pharmacy located?	Low Income/economically depressed	Urban/poor to lower middle income
Are there any significant nursing homes, long term care facilities, hospitals, medical centers, weight loss facilities, drug treatment facilities, and/or pain treatment facilities in the local area?	2 Hospital within 10 minutes, 3 pain clinics and 4 nursing homes	2 Hospitals, pain doctors (Torres & Veres) and several nursing homes.
How would you describe your local area? What communities do your patients predominately come from?	Low Income with a majority bein Medicaid patients.	Poor/Medicaid
Has there been recent changes to the area (i.e. other pharmacies/ major prescribers)	Closest CVS closed about a year ago and Overholz pharmacy (independent) closed.	CVS 3305 closed
Do difficult/questionable clientele frequent the pharmacy? (describe)	A few who try to get scripts filled early.	All questionable patients are run through OARRS (Ohio Automated Response Reporting System). These are just a few on a monthly basis.

Prescribers		
Interview Question	PIC	RPH 1
Do you have any concerns with any <u>Prescribers</u> for your patients? Who and why?	Dr Veres-High unit amounts Hydrocodone scripts and Dr. Torrres. Both offices write scripts for pain meds (hydrocodone) ranging from 90-160 tablets.	Both Veres and Torres based on the high number of scripts written for hydrocodone.
Does the store have a "DO NOT FILL" list? Who is on it?	[Protected Health Information]	Notes on written in patient profiles, but not list per se.
Are you filling for any of these Prescribers of Concern? If so, why are you comfortable filling these prescriptions?	All scripts run through OARRS and anything that is questionable will not be filled.	Utilize OARRS when filling scripts for them.
Do you fill for any prescribers out side your local area? Why are you comfortable filling these scripts.	5-10 scrips per month for the Cleveland Clinic, this is the premier hospital in Ohio particularly for cancer patients.	Not often, a few scripts from Cleveland Clinic and Massilon Hospital both are within 50 miles of the store.
What has caused you to call a prescriber to verify a script?	If the script appears altered or there is evidence of patient doctor shopping.	Usually on Emergency Room scripts and after running through OARRS and evidence that patient receives the same prescribed
What is your procedure to verify a script wit ha prescriber? Who calls? Who do you talk to? What information is obtained? Is a diagnostic code obtained? How is the verification documented?	Pharmacist contacts Dr's office and usually the nurse or office admin will transfer call to the doctor. Once verified a note will be placed in the patient profile.	Pharmacist, calls doctors office and speaks and verifies the script. All info is documented in profile notes.
Are you aware of any prescriber that only takes cash for appointments?	No	No
Does a particular prescriber routinely prescribe a cocktail that includes a Opiod with one or two others? Who and what is prescribed?	Dr. Torres- Hydro and muscle relaxers on some patients. Dr. Veres-Hydro and anxiety meds.	Dr. Torres-Hydro, tramadol and muscle relaxer.
Has a prescriber brought in controlled drug prescriptions to be filled either for him/herself, a patient, or family member? Explain if yes	No	No

C2 Volume			
24	VOLUME	Approximately how many CII prescriptions are filled daily?	15 Dozen
25	VOLUME	According to the pharmacist, what is the fastest moving CII drug(s)? What is causing the volume?	Oxycodone Oxycodone
26	VOLUME	What drives the oxycodone/oxycontin scripts in your pharmacy?	Dr. Torres & Dr. Veres offices Torres/Veres and Emergency Room scripts.
27	RPH	Does the pharmacist set aside opioids for particular customers? If yes, explain.	1 customer [Protected Health Information] cancer patient and is a monthly customer. 1 customer (40 mg Oxycontin) note is left in safe as a reminder the pharmacist.

		Hydrocodone Concerns		
28	Hydromorphone / Dilaudid	In regards to Hydrocodone scripts and volume, what is driving the heavy volume of hydrocodone scripts?	ER scripts and Dr. Veres and Dr. Torres. Hydrocodone 10/325-41,206 units filled and Hydrocodone 5/500-28,548 units filled since December.	ER scripts and two doctors offices (pain clinics) Veres and Torres.
29	Hydromorphone / Dilaudid	Describe those patients who pay non-insurance (cash price) for hydrocodone? Is there common age, demographic, prescriber, etc	10% of scripts usually younger patients who do not have insurance and mostly for Emergency Room scripts.	5-10% of scripts and these are mostly younger people.
30	Hydromorphone / Dilaudid	Do a high percentage of patients receiving hydrocodone fall into a age bracket? (0-25, 25-35, 35-55, 65 and older)	25-35 and 35-55 are a very high percentage of these scripts.	25-35
31	Hydromorphone / Dilaudid	Do patients receiving hydrocodone scripts pay cash price (no insurance)? Do some have insurance in profile but choose to pay cash?	Just a few but pharmacist will check to verify if they have insurance.	Insurance patients who want to pay cash are denied.
32	Hydromorphone / Dilaudid	Does the RPh fill hydrocodone scripts from patients or prescribers from out of area?	Cleveland Clinic	Sometimes from Cleveland Clinic. None from out of state.
33	Hydromorphone / Dilaudid	Do prescribers prescribe drug combinations that include hydrocodone? What combinations and what prescribers?	Veres-Hydrocodone and Valium	Veres-Hydro and anxiety meds.
34	Hydromorphone / Dilaudid	Do a high percentage of patients receiving hydrocodone fill their scripts early?	15-20% attempt but pharmacy will have a two day policy on early fills.	10-15% but will not fill any scripts outside of 2 days.

Patients		
Do many patients pay cash for opioid prescriptions? Do they pay cash when they have insurance?	Sometimes ER but not often	No
Are customers traveling from out of state to have prescriptions filled? If so, list states.	No	No
Do you verify the patient information on the prescription? How is this documented (i.e. are there notes on the hard copy or is the ID noted anywhere?)	Written on hard copy with all ID information.	Documented on hard copy.
Do customers return too frequently with opioid prescriptions to be filled? What drugs and what is the procedure?	Oxycodone but not a problem, patients are denied and notes placed in profile.	These are denied and noted in profile usually for percocet/oxycodone.
Do customers come in together to get controlled drug prescriptions filled? (i.e. groups through the drive thru, several members to the RX counter)	Sometime from the ER but not much	Not often.
Do patients bring in multiple prescriptions in different individual's names? Does this occur with any particular prescriber?	Some families but very rare.	No
Does one person pay for multiple patients prescriptions?	No	No
What is the age group of the majority of opioid prescriptions?	35-55	25-35
Do customers ask for any drugs by name, street name or color? (i.e. "M's" or "blues")	Yes but they are refused.	Some times they will ask for the name brand but that is the extent of it.

Pharmacist		
Does the pharmacist conduct and understand his/her corresponding responsibility to determine prescriptions are written for legitimate medical purpose?	Yes	Yes
Did the pharmacist receive/review the narcotic dispensing guidelines? If NO, provide a copy of the guidelines and check box that provided.	Yes	Yes
Does the pharmacy have access to a PMP? (prescription monitoring program) How often is it used?	Yes, OARRS (state of Ohio's monitoring program). Uses it a lot.	OARRS. Quite Often
Does the pharmacist refuse to fill the prescription after the verification process if he/she is uncomfortable with the prescriber's response(s)? (confirming the pharmacist does not "verify and fill".)	Yes	Yes
Have you had any inquiry from BOP or law enforcement agency? Please detail contact.	Once but it was a few years ago.	No

Records Review			
56	VOLUME	Review DEA 222 and determine if there any significant ordering patterns regarding CII opioid drugs identified? (Review 2 months)	Store usually recieves OSV shipments weekly for both Oxycodone 10/325 and 5/325 each week.
57	DOSE	Review the CII logbook and Drug Usage report by DEA class . Note high prescription dosage occurrences? For the last month give examples of doses per prescription.	2 scripts that were 210 units and 12 scripts for 180 units of Oxycodone 10/325. 2 scripts that were 200 units and 2 that were 180 units for Oxycodone 5/325.
58	Travel	Run Detail Drug by DEA Class dispensing report for last 14 days and note any out of state/area scripts.	No evidence of out of state scrips

A

Prescribers of Concern		
For any of the Prescribers of Concern brought forward by the RPh, answer below questions for any prescribe the PIC or RPh describes as a concern.		
PRESCRIBER	Prescriber:	Drs. Frank & Zachary Veres
PRESCRIBER	DEA # or address of practice	4687 Mahoning Ave NW, Warren, OH 44831
PRESCRIBER	What is the concern?	Hydrocodone commonly prescribed at #120 units for most patients.
PRESCRIBER	What do we know about this prescriber and why are we comfortable filling scripts?	Sports medicine and pain clinic, does a lot of surgeries. His nurses do check OARRS and seem diligent in suspending prescribing for questionable patients.
PRESCRIBER	What have we done to validate that the scripts are for a valid medical purpose?	Called to verify scripts and check OARRS.
PRESCRIBER Detail	What is known about their patients? Age? Drugs prescribed? Cocktails? Early fills? Cash patients? Out of area prescriber or patients?	Middle age patients, hydrocodone prescribed frequently, sometime cocktails involving muscle relaxers or anxiety meds. Earlies scripts filled are within 2 days. Cash patients are rare and none out of the area, this prescriber is local and has had a practice for quite some time.
PRESCRIBER Detail	Are you currently filling for this prescriber?	
PRESCRIBER	Prescriber:	Dr. Jose Torres
PRESCRIBER	DEA # or address of practice	1806 E. Market Street, Warren, OH 44483
PRESCRIBER	What is the concern?	cocktail prescribing (hydro and muscle relaxers).
PRESCRIBER	What do we know about this prescriber and why are we comfortable filling scripts?	Pain Management doctor.

A

PRESCRIBER	What have we done to validate that the scripts are for a valid medical purpose?	Check OARRS and call the doctor.	
PRESCRIBER Detail	What is known about their patients? Age? Drugs prescribed? Cocktails? Early fills? Cash patients? Out of area prescriber or patients?	35-55 years old, writes for cocktail combos (see above infor). Pharmacy will not fill scripts greater than 2 days early. Cash patients are uncommon. He is a local doctor and patients are local.	
PRESCRIBER Detail	Are you currently filling for this prescriber?		

Prescribers of Concern		
For any of the <u>Prescribers of Concern brought forward by the RPh</u> answer below questions for any prescribe the PIC or RPH describes as a concern.		
PRESCRIBER	Prescriber:	
	DEA # or address of practice	
	What is the concern?	
	What do we know about this prescriber and why are we comfortable filling scripts?	
	What have we done to validate that the scripts are for a valid medical purpose?	
	What is known about their patients? Age? Drugs prescribed? Cocktails? Early fills? Cash patients? Out of area prescriber or patients?	
	Are you currently filling for this prescriber?	
PRESCRIBER	Prescriber:	
	DEA # or address of practice	
	What is the concern?	
	What do we know about this prescriber and why are we comfortable filling scripts?	
	What have we done to validate that the scripts are for a valid medical purpose?	
	What is known about their patients? Age? Drugs prescribed? Cocktails? Early fills? Cash patients? Out of area prescriber or patients?	
	Are you currently filling for this prescriber?	

Please highlight any concerns with dispensing guidelines in regards to oxycodone and hydrocodone scripts. What do you conclude based on your store investigation and interviews?

Pharmacy is following proper guidelines and is diligent on checking for evidence of doctor shopping by patients and verifying any questionable scripts through the doctors offices. Possible concern with two doctor's offices that fill the bulk of the scripts for Oxycodone and Hydrocodone and evidence of cocktail scripts written by these doctors. Due to location of two local hospitals and ER scripts is causing increase of pain med scripts along with recent closing a CVS pharmacy that was located apprixiamately 4 miles from this location.

Please summarize any other pertinent information discovered during your visit that may need to be addressed or followed up on?

Please have the RX Sup comment on the controlled drug dispensing concerns in the store. Please address specific concerns communicated by corporate or general observations surfaced during the visit.

Concern: _____ ex: Cash scripts

Concern: _____ ex: Oxy volume

Concern: _____ ex: Distance traveled

Concern: _____ ex: Cash scripts

INSTRUCTIONS AFTER LP REVIEW COMPLETED:

1) Email completed document:

within 24 hours

2) Subject line for Email MUST read:

Store # _____. Privileged and Confidential- prepared at the Direction of Counsel

3) Email to:

rxregulatory@cvs.com

JRROBINSON@CVS.COM